

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
CRIMINAL ACTION

UNITED STATES OF AMERICA : NO. 06-31-03JJF

v. :

JOSE LUIS BECERRA-YEPEZ :

DEFENDANT, JOSE LUIS BECERRA-YEPEZ'S
MOTION FOR LEAVE TO HIRE AN INTERPRETER

TO THE HONORABLE, JOSEPH J. FARNAN, JR., A JUDGE OF SAID COURT:

AND NOW, comes Defendant, JOSE LUIS BECERRA-YEPEZ, by his Court-appointed counsel, CHRISTOPHER G. FURLONG, ESQUIRE, and respectfully requests that the Court enter an Order authorizing the hiring of an interpreter, and in support thereof, avers as follows:

1. On or about April 4, 2006, the Honorable Mary Pat Thyng, a United States Magistrate entered an Order appointing present counsel as Court-appointed counsel for the above-named Defendant.
2. The Defendant does not speak or read the English language.
3. Appointed counsel does not speak Spanish nor can he read Spanish. Co-Defendants have the good fortune to have two Court-appointed counsel that speak their native language.
4. Defendant is presently being detained and is incarcerated in the Salem County Prison.
5. Defense counsel needs an interpreter to meet with him and his client so defense counsel can effectively represent and communicate with his client.
6. Under the Criminal Justice Act 18 U.S.C., 3306A(e)(1), counsel is

authorized to obtain "...expert or other services necessary for adequate representation".

7. Counsel has contacted Raymond J. McConnie Zapater, an interpreter, whom counsel has been able to retain in the past, more specifically, in the District Court for the Eastern District of Pennsylvania. It is also believed that Mr. McConnie Zapater is well known to the District Court in Delaware as well. A copy of Mr. McConnie Zapater's resume is attached hereto and made part hereof and marked Exhibit "A". Counsel believes that Mr. McConnie Zapater's services have been used by others in this District on prior occasions.

8. Mr. McConnie Zapater charges the rate of \$65.00 an hour for interpreting and travel.

9. Counsel further believes that he must obtain approval for services rendered any time under the Criminal Justice Act which exceeds \$300.00. It is counsel's estimation that Mr. McConnie Zapater's services will exceed the \$300.00 minimum and is specifically requesting at least an initial authorization of up to \$1,000.00 for Mr. McConnie Zapater's services.

10. Counsel believes that extensive time will be needed to meet with his client to formulate a defense to the instant matter, as well as review tape recordings of co-Defendants which are believed to be in Spanish.

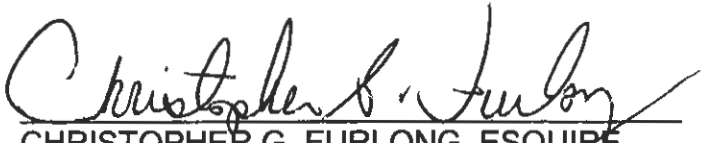
11. Counsel represents to the Court that he initially attempted to meet with his client at the Salem County Prison on Wednesday, April 5, 2006, and due to the fact that an interpreter was not readily available, had to rely upon the services of a prisoner in order to communicate with his client on basic matters. Counsel believes that is not an effective way in which to communicate with his client and causes a wealth of

potential difficulties for the client as well as any interpreter who is incarcerated with him.

12. Mr. McConnie Zapater has indicated a willingness to undertake employment in this matter.

WHEREFORE, Defendant, JOSE LUIS BECERRA-YEPEZ, by and through his Court-appointed counsel, CHRISTOPHER G. FURLONG, ESQUIRE, respectfully requests this Court to enter an Order authorizing defense counsel to retain the services of Raymond J. McConnie Zapater as an interpreter to assist defense counsel in this matter.

Respectfully submitted,


CHRISTOPHER G. FURLONG, ESQUIRE
Court-appointed counsel for Defendant
JOSE LUIS BECERRA-YEPEZ

IN THE UNITED STATES DISTRICT COURT
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ORDER

AND NOW, this day of , 2006, upon the Motion of Defendant, JOSE LUIS BECERRA-YEPEZ, through his counsel, CHRISTOPHER G. FURLONG, ESQUIRE, For Leave to Hire an Interpreter, is hereby **ORDERED** and **DECREED** that defense counsel may retain the services of Raymond J. McConnie Zapater. Further, Mr. McConnie Zapater may be paid at the rate of \$65.00 and hour up to the sum of \$1,000.00.

If the use of the interpreter exceeds that amount, defense counsel must apply to the Court for additional funds to pay the interpreter.

BY THE COURT:

JOSEPH J. FARNAN, JR.

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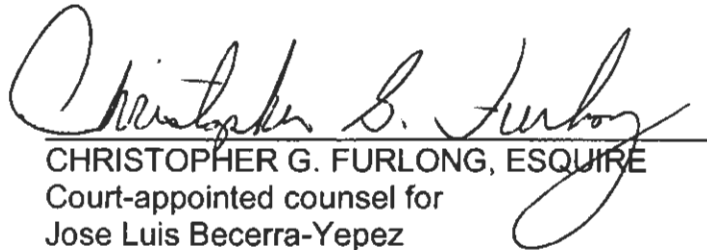
CERTIFICATE OF SERVICE

I, Christopher G. Furlong, Esquire, hereby certify that I served the foregoing Motion for the Appointment of an Interpreter upon the following via United States Mail:

Adam Safwat, Esq., AUSA
US Department of Justice
U.S. Attorney's Office
District of Delaware
P.O. Box 2046
Wilmington, DE 19399-2046

Raymond J. McConnie Zapater
619 Bainbridge Street
Philadelphia, PA 19147

Jose Luis Becerra-Yepe
ID#332211
Salem County Correctional Facility
125 Cemetery Road
Woodstown, NJ 08098


CHRISTOPHER G. FURLONG, ESQUIRE
Court-appointed counsel for
Jose Luis Becerra-Yepe

Date 4/11/06